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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ARKANSAS

DIVISION

KELLY TAYLOR

PLAINTIFF

v.

CASE NO. CV-2012-505-2

INTERCONTINENTAL HOTELS GROUP RESOURCES, INC.;
HOLIDAY INNS, INC.,
D/B/A HOLIDAY INN JONESBORO;
JOHN DOES NOS. 1-9; AND
JOHN DOE CORPORATIONS 1-9

DEFENDANTS

COMPLAINT

Comes the Plaintiff, Kelly Taylor, by and through her attorneys, Gary Holt & Associates, P.A., and for her Complaint in negligence against the Defendants, Intercontinental Hotels Group Resources, Inc.; Holiday Inns, Inc., doing business as Holiday Inn Jonesboro, John Does Nos. 1-9, and John Doe Corporations Nos. 1-9, alleges and states:

1. The Plaintiff is an individual resident of Jefferson County, Arkansas, and so resided in Jefferson County at the time of the events giving rise to this action.

2. The Defendants, Intercontinental Hotels Group Resources, Inc.; and Holiday Inns, Inc., doing business as Holiday Inn Jonesboro, are foreign corporations doing business in Arkansas. Defendant Intercontinental Hotels Group Resources, Inc.'s registered agent for service is The Corporation Company, 124 West Capitol Avenue,

FILED IN MY OFFICE AND SUMMONS
ISSUED AT 11:15 O'CLOCK AM
1 SEP - 6 2012 DATE
LAFAYETTE WOODS SR., CLERK
K. Allard

EXHIBIT

A

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Suite 1900, Little Rock, AR 72201. The registered agent for service for Defendant Holiday Inns, Inc., doing business as Holiday Inn Jonesboro, is The Corporation Company, 417 Spring Street, Little Rock, AR 72201.

3. The identities of John Does Nos. 1-9 who, through information and belief, are employees, agents, and/ or servants of Defendants, Intercontinental Hotels Group Resources, Inc.; and/or Holiday Inns, Inc., doing business as Holiday Inn Jonesboro, are unknown at this time; hence, the pseudo-names of John Does Nos. 1-9 are used pursuant to Ark. Code Ann. § 16-56-105. In accordance with Ark. Code Ann. § 16-56-105, Plaintiff has attached hereto the Affidavit of Plaintiff's Counsel as Exhibit "A." Similarly, the identities of John Doe Corporations Nos. 1-9, who, through information and belief, are agents, subsidiaries, or parent corporations of Defendants, Intercontinental Hotels Group Resources, Inc.; and/or Holiday Inns, Inc., doing business as Holiday Inn Jonesboro, are unknown at this time, and Plaintiff has used the pseudo-names of John Doe Corporations Nos. 1-9, which are also set forth in the affidavit of Plaintiff's counsel attached hereto as Exhibit "A."

4. This is the proper venue for this action and this court has jurisdiction of the parties.

5. On or about September 27, 2009, the Plaintiff, Kelly Taylor, was a Business Invitee at the Holiday Inn in Jonesboro, Arkansas. As Plaintiff walked through the lobby toward the main exit after checking out, she slipped and fell on an area of wet tile, which was unmarked, and therefore virtually invisible to hotel guests and customers such as Plaintiff and creating a hazard to their safety.

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6. As a result of Defendant's negligence in maintaining its property, Plaintiff sustained serious injuries and damages, as more specifically described herein.

7. Defendants, Intercontinental Hotels Group Resources, Inc.; and Holiday Inns, Inc., doing business as Holiday Inn Jonesboro, through its agents, servants and/or employees, including but not limited to John Does Nos. 1-9, and John Doe Corporations Nos. 1-9, were negligent in the following respects:

- a) Failing to provide safe premises for the Plaintiff, as a business invitee;
- b) Failing to properly mark the areas of wet tile in the lobby of the hotel;
- c) Failing to properly train or supervise employees as to the safe upkeep and maintenance of its property;
- d) Failing to properly inspect the premises;
- e) Failing to warn the Plaintiff that there was an dangerous condition; and
- f) Otherwise failing to exercise ordinary care under the circumstances for the safety of the Plaintiff.

8. As a result of the Defendants' negligence and carelessness, the Plaintiff, Kelly Taylor, sustained painful and permanent personal injuries; incurred medical expenses in the past and is reasonably certain to require medical expenses in the future; and underwent pain, suffering and mental anguish in the past and is reasonably certain to experience pain, suffering and mental anguish in the future; and sustained lost working time and wages in the past.

9. Plaintiff demands a trial by jury.

10. Plaintiff reserves the right to amend her complaint, pending further

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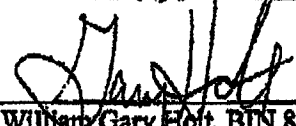
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discovery.

WHEREFORE, the Plaintiff, Kelly Taylor, prays for a judgment against the Defendants, Intercontinental Hotels Group Resources, Inc.; Holiday Inns, Inc., doing business as Holiday Inn Jonesboro, John Does Nos. 1-9, and John Doe Corporations Nos. 1-9, jointly and severally, in an amount adequate to compensate her for her injuries, said amount being in excess of that required for federal court jurisdiction in diversity of citizenship cases. The Plaintiff further prays for costs, interest and all other just and proper relief to which she may be entitled. Plaintiff prays for a jury trial.

Respectfully submitted,

Gary Holt & Associates, P.A.
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